

ORIGINAL

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FILED
DISTRICT COURT OF GUAM

OCT - 4 2006 *PSD*

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE
TERRITORY OF GUAM

UNITED STATES OF AMERICA,
Plaintiff,
vs.
KOO'S 108,
Defendant.

CIVIL CASE NO. **06-00029**

AFFIDAVIT OF
JEFFREY M. POLLACK

I, JEFFREY M. POLLACK, being duly sworn, do hereby depose and state:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the U.S. Department of Commerce, National

1 Oceanic and Atmospheric Administration, National Marine Fisheries Service, Office for
2 Law Enforcement ("NOAA OLE"), presently assigned to the Honolulu Field Office,
3 Honolulu, Hawaii. I have been a SA with NOAA OLE since June 2004. Part of my
4 duties consists of investigating violations of United States fisheries laws codified under
5 the Magnuson-Stevens Fishery Conservation and Management Act ("Magnuson-Stevens
6 Act"), and its related regulations, which include prohibitions on foreign fishing vessels
7 fishing in United States fishing waters without a valid permit. Before becoming a NOAA
8 OLE SA, I was an Immigration and Customs Enforcement SA for around three years, and
9 Internal Revenue Service Criminal Investigation SA for over six years, and in that
10 approximate nine year time period, I investigated numerous fraud and money laundering
11 investigations in the Central District of California. My formal education includes a
12 Bachelor of Science in accounting.

13
14 **II. PROPERTY TO BE SEIZED**

15 2. This affidavit is made in support of a Complaint for Forfeiture to arrest the
16 foreign fishing Vessel **KOO'S 108**, including the Vessel's fishing gear, furniture,
17 appurtenances, stores, electronic and documentary records (including plotters, fax
18 machines and other devices), and catch of fish, for violating 16 U.S.C. § 1857(2)(B)
19 (Foreign Fishing Vessel Engaged in Fishing within the United States EEZ without a Valid
20 and Applicable Permit). 16 U.S.C. § 1861(b)(1)(A) states in part that with or without a
21 warrant, a fishing vessel (together with its fishing gear, furniture, appurtenances, stores,
22 and cargo) used or employed in the violation of any provision of this chapter may be
23 seized. Further, Section 1861 also states that other evidence related to any violation of
24 any provision of this chapter may be seized. The **KOO'S 108**, a Republic of the Marshall
25 Islands ("RMI") flagged purse seine fishing vessel, is a 72.37 meter long, four deck
26 vessel having a gross weight of 1,100 tons, and listed in vessel registration documentation
27 as being owned by the KOO'S FISHING COMPANY ("KFC"), a RMI based company.

1 The Vessel's hull and superstructure are white in color, with the Vessel name printed on
2 the right and left side of the front area of the Vessel. Further, the Vessel's international
3 radio call sign of V7EF3 is printed about mid-ship on both sides of the Vessel.
4

5 **III. BACKGROUND INFORMATION**

6 3. Based upon my training and experience as a NOAA OLE SA, and from
7 information obtained from other NOAA personnel, I know the following:

8 **A. Magnuson-Stevens Fishery Conservation and Management Act**

9 4. The Magnuson-Stevens Act is the United States fishery law that governs the
10 management of living marine resources, which includes fish, in the waters under the
11 jurisdiction of the United States. The ultimate purpose of the Magnuson-Stevens Act is to
12 help insure that the living marine resources, which includes highly migratory fish such as
13 tuna, continue to exist at sustainable levels, while at the same time allowing the resource
14 to continue to be available for harvesting. The Magnuson-Stevens Act attempts to
15 accomplish the goal of a sustainable fishery by regulating the United States fishing
16 industry, and by also regulating the fishing activities that occur in ocean areas where the
17 United States claims sovereign rights.

18 5. A portion of the ocean area that the United States claims sovereign rights over,
19 for the purpose of exploring, exploiting, conserving, and managing of natural resources,
20 is the exclusive economic zone ("EEZ"). The United States considers that the EEZ is that
21 area adjacent to the United States which, except where modified to accommodate
22 international boundaries, encompasses all waters from the seaward boundary of each of
23 the coastal states to a line on which each point is 200 nautical miles from the baseline
24 from which the territorial sea of the United States is measured. The United States, and
25 other nations, have the rights to control, manage, and use the natural resources, including
26 living marine resources such as fish, within their respective EEZ's. Thus, the United
27 States has jurisdiction to control fishing activities within its EEZ, including the EEZ
28

1 waters around United States territories and Pacific Insular Possessions of the United
2 States.

3 6. Howland and Baker Islands are small uninhabited islands near the equator, due
4 south of Midway Island, and they are considered Pacific Insular Possessions of the United
5 States. Howland and Baker Islands, which are within 60 nautical miles of each other,
6 provide the United States with an EEZ around the islands. The United States thus has
7 sovereign rights over the fishery resources within the EEZ surrounding Howland and
8 Baker Islands.

9 7. For a foreign fishing vessel to legally engage in fishing activities within the
10 United States EEZ surrounding Howland and Baker Islands, the foreign fishing vessel
11 would need to have a Pacific Insular Area fishery agreement ("PIAFA") permit.

12 8. According to the Magnuson-Stevens Act, fishing is defined in part as the
13 catching, taking, or harvesting of fish, the attempted catching, taking, or harvesting of
14 fish, and any other activity which can reasonably be expected to result in the catching,
15 taking, or harvesting of fish. One type of fishing device that purse seine fishing vessels
16 use to assist in their fishing operations is the fish aggregating device ("FAD"). The FAD
17 consists of objects, such as floats and fishing nets, that are connected together and placed
18 into the ocean to create a floating pile of material, to which a radio beacon buoy is
19 attached. The FAD is allowed to drift in the ocean, and may drift for multiple weeks or
20 months before a fishing vessel homes-in on the radio beacon attached to the FAD. FADs
21 are used because once in the water for a period of time, fish will sometimes start to
22 congregate under the FAD. Generally, small fish will gather under the FAD, and then
23 eventually, large fish such as tuna may come to feed on the small fish. Thus, if a purse
24 seine fishing vessel comes upon a FAD that has a large amount of tuna under the FAD,
25 the vessel will deploy its net to catch the tuna fish. The common term used for the
26 deployment of the net is that the vessel has done a set. Since FADs are used to harvest
27 fish, their use by fishing vessels is considered to be an act of fishing.

1 9. Due to the fact that FADs drift with ocean currents, one fishing technique that
2 poaching fishing vessels use is to illegally deploy FADs in a country's EEZ, knowing that
3 the FADs will drift out of that EEZ with fish that aggregated under the FADs while inside
4 the EEZ. The vessel will then attempt to catch those aggregated fish once the FADs have
5 drifted to an area where the vessel can legally fish, such as in international waters.

6
7 10. There is concern in the government and the fishing industry of the United
8 States and other nations that the stocks of highly migratory fish species, such as tuna, are
9 being depleted below sustainable levels due to over fishing. In an effort to help sustain
10 the fishery, the United States and other countries have entered into numerous fishery
11 treaties, with the intention of regulating the catch of highly migratory fish species. The
12 need for international cooperation is deemed necessary for the fishery to stay viable, due
13 to the fact that there is only so much fish in the ocean to catch, and because highly
14 migratory fish travel freely from one country's EEZ to another country's EEZ. Because
15 many highly migratory fish provide high dollar returns, countries aggressively enforce
16 their fishery laws, and the sovereign rights and exclusive fishery management authority
17 over the highly migratory fish inside their respective EEZ. Thus, the United States
18 considers the highly migratory fish inside its EEZ as an important economic resource.

19 **B. The Pacific Islands Forum Fisheries Agency**

20 11. The United States has entered into numerous fishery related treaties, and one
21 of those treaties is known as the South Pacific Tuna Treaty ("SPTT"). The SPTT is
22 primarily an access agreement for United States flagged fishing vessels to be able to fish
23 in the EEZ of a number of Pacific island states. These Pacific island states are
24 represented by an international agency called the Pacific Islands Forum Fisheries Agency
25 ("FFA"). The FFA monitors the compliance of United States and other foreign nation
26 fishing vessels with restrictions enacted by FFA member countries. For instance, a
27 foreign fishing vessel may have a license to fish in Fiji's EEZ, but not have a license to
28 fish in the Republic of the Marshall Islands ("RMI") EEZ. If the FFA detects that the

1 foreign fishing vessel is illegally fishing in the RMI EEZ, the FFA would contact the RMI
2 government, and provide the RMI government with evidence of the violation. The
3 evidence that the FFA may have ranges from observations from personnel on surveillance
4 aircraft, to records from FFA observers onboard the licensed fishing vessels.

5 12. The different FFA member nations have individuals who are trained as FFA
6 observers. These individuals attend formal FFA training where they learn about fishing
7 operations, navigation, and other subjects that allow them to perform observer duties.
8 The observers are assigned to fishing vessels that are authorized to fish in FFA member
9 countries' EEZs. The observers go out to sea with the fishing vessels, and while at sea
10 with the vessels, the observers monitor the fishing operations. The FFA observers
11 typically record detailed accounts of their observations, including where the vessels have
12 fished, and what species were caught.

13 **C. Staffing On A Foreign Purse Seine Fishing Vessel**

14 13. Foreign purse seine fishing vessels are usually staffed by a small number of
15 officers, and by the crew. On a Taiwanese purse seine fishing vessel, it is common that
16 the person in overall command of the vessel is called the master. The other officers on a
17 Taiwanese purse seine vessel will usually consist of a chief officer, who may also be
18 called the captain, and a chief engineer.

19 20 **IV. SUMMARY OF PROBABLE CAUSE**

21 14. This affidavit is submitted for the limited purpose of establishing probable
22 cause to seize the foreign fishing Vessel **KOO'S 108**, for violating 16 U.S.C. §
23 1857(2)(B)(Foreign Fishing Vessel Engaged in Fishing within the United States EEZ
24 without a Valid and Applicable Permit). This affidavit is intended to show that there is
25 sufficient probable cause for the requested seizure warrant, and does not purport to set
26 forth all my knowledge of the investigation into this matter. The evidence set forth in this
27 affidavit is based on my personal observations, training, and experience, review of
28

1 documents, interviews of witnesses, information obtained from other Special Agents and
2 government personnel, and information obtained from other sources as set forth below.

3 15. The evidence detailed in this affidavit shows that there is probable cause to
4 believe that the foreign fishing Vessel **KOO'S 108** engaged in fishing operations in the
5 United States EEZ surrounding Howland and Baker Islands without having a valid and
6 applicable permit by deploying 6 FADs inside the United States EEZ. Evidence indicates
7 that the master and the captain of the **KOO'S 108** were well aware that the Vessel was
8 located inside the United States EEZ, and that it was illegal for them to deploy FADs
9 inside the EEZ. Evidence of the master's and captain's knowledge resulted from their
10 interference with a FFA observer who was onboard the Vessel during the illegal FAD
11 deployments. While inside the United States EEZ, the captain repetitively coerced the
12 FFA observer to record false vessel position data which would have reflected the Vessel's
13 position to be outside of the United States EEZ. Further, evidence shows that the ultimate
14 owner of the **KOO'S 108**, KWANG-MING KOO, had been civilly fined by NOAA for
15 another one of his purse seine fishing vessels illegally deploying FADs into the United
16 States EEZ surrounding Howland and Baker Islands back in August 2000.

17 16. Evidence of the **KOO'S 108's** FAD deployments and of the knowledge of the
18 master and captain originated from a FFA observer, Dike Poznanski, who was onboard
19 the **KOO'S 108** during the entire voyage within which the FADs were deployed inside
20 the United States EEZ. Poznanski kept detailed written records of the captain's repetitive
21 attempts to get Poznanski to falsely document the Vessel's position as being outside the
22 EEZ. Poznanski also recorded navigational and position data in relation to FAD
23 deployments as observed from Global Positioning System and radar readouts. Poznanski
24 recorded this data contemporaneously to the FAD deployments and the captain's coercive
25 attempts. The information Poznanski provided is considered reliable, for as a
26 representative of the FFA, Poznanski attended formal observer training, and as a
27 professional observer, he had already observed on other fishing vessels before his
28 assignment to sail with the **KOO'S 108**.

1 **V. STATEMENT OF PROBABLE CAUSE**

2 **A. Six Illegal FAD Deployments**

3 17. Based on my review of FFA observer records and FFA vessel fish catch
4 reports that I obtained from NOAA OLE SA Kevin Painter, from information I obtained
5 from SA Painter, from an interview with Poznanski, from results of position plotting and
6 a distance versus time analysis conducted by NOAA Pacific Islands Regional Office
7 employee Robert Harman, who formerly was a NOAA OLE employee specializing in
8 vessel plotting and position analysis, from an interview with Robert Harman, from
9 information I obtained from U.S. Coast Guard ("USCG") LTJG Kyle Deems, and from
10 my own observations, analysis, and knowledge, I know the following to be true:

11 a. During the evening of December 31, 2003, while Poznanski was looking
12 at nautical charts onboard the **KOO'S 108**, Poznanski was informed by MENG-HENG
13 YEN, the Chief Officer/Captain of the **KOO'S 108**, that the **KOO'S 108** was inside
14 Howland Island's waters.

15 b. After Poznanski documented the **KOO'S 108's** position inside the
16 United States EEZ surrounding Howland and Baker Islands at 6:07 pm on January 1,
17 2004, Poznanski observed two FAD deployments during that same evening, with the first
18 at 8:56pm, and the second at 11:44 pm. I conducted analyses, which took into account
19 information obtained from Robert Harman, which revealed that the two FADs were
20 deployed inside the United States EEZ, and not in international waters, for deploying the
21 FADs in international waters would have required the vessel to travel at speeds
22 significantly higher than its maximum safe operating speed of 15.4 knots. To have
23 deployed the 8:56 and 11:44 pm FADs in international waters would have required the
24 vessel to have transited to a documented Vessel position at 5:22 am the next morning at
25 speeds of approximately 26 or 39 knots, respectively. Further, had the **KOO'S 108**
26 traveled to international waters to deploy the two FADs, and then, at its maximum safe
27 operating speed, attempt to transit to the 5:22 am position near Howland Island, the
28

1 Vessel would have only been able to cover approximately 130 nautical miles if it started
2 the transit at 8:56 pm, and 87 nautical miles if it started the transit at 11:44 pm. The
3 approximate distance from the international waters location to the 5:22 am position was
4 around 220 nautical miles. Thus, it would have been physically impossible for the two
5 FADs to have been deployed outside the United States EEZ.

6 c. According to USCG LTJG Deems, operating a vessel at speeds greater
7 than its maximum safe operating speed can cause damage to a vessel, such as blowing an
8 engine. Thus, the evidence supports that the two FADs were deployed in the United
9 States EEZ. A position plot showing the distance from the EEZ border area to the next
10 morning 5:22 am vessel position is attached to this affidavit as Attachment A (attachment
11 A-1 shows latitudes and longitudes). Attachments A and B (Attachment B is mentioned
12 in the next paragraph) both graphically depict the EEZ area and the surrounding
13 international waters, or high seas areas. Further, the position points shown in those plots
14 accurately represents recorded Vessel positions. The plots were obtained from Robert
15 Harman and he incorporated descriptive information into the plots.

16 d. Between the time of 5:10 am and 9:55 am on January 2, 2004, four
17 FADs were deployed from the **KOO'S 108**, and all four of the FADs were deployed well
18 within the United States EEZ surrounding Howland and Baker Islands. Poznanski noted
19 that the first of the four FADs was deployed at 5:10 am, and thus would have been near
20 the location of where the Vessel was at during the 5:22 am position report, which was
21 relatively near Howland Island. Poznanski then explained that from the Vessel's position
22 at 5:22 am, the Vessel followed a course of 300 degrees, and continued on that course
23 throughout the time the remaining three FADs were deployed (a graphical description of
24 the 300 degree course and the FAD deployments is shown on Attachment B).

25
26 **B. The Master And Captain's Knowledge That The FAD Deployments Were**
27 **Illegal**
28

1 18. There is probable cause to believe that CHIANG-SHOU YEN, the master of
2 the **KOO'S 108**, and MENG-HENG YEN knew that it was illegal to deploy FADs and
3 engage in fishing activity within the United States EEZ, based on the following:

4 a. Review of Poznanski's observer diary and observer trip report which
5 covered the time period wherein the FADs were deployed inside the United States EEZ,
6 and information learned from my interview of Poznanski on August 10, 2005, reveal:

7 i. During the voyage of December 16, 2003 through January 9,
8 2004, within which the FADs were deployed inside the United States EEZ around
9 Howland and Baker Islands, CHIANG-SHOU YEN was the master of the **KOO'S 108**,
10 and MENG-HENG YEN was the chief officer/captain of the Vessel.

11 ii. During the evening of December 31, 2003, MENG-HENG YEN
12 told Poznanski that the **KOO'S 108** was inside of Howland Island's waters, and that they
13 could not fish.

14 iii. On January 1, 2004, while the **KOO'S 108** was inside the United
15 States EEZ, Poznanski visited the Vessel's wheelhouse to obtain Vessel position data, and
16 during his visit, MENG-HENG YEN came over to talk with him. While MENG-HENG
17 YEN was talking to Poznanski, CHIANG-SHOU YEN was standing nearby steering the
18 Vessel and listening to MENG-HENG YEN statements to Poznanski. MENG-HENG
19 YEN told Poznanski that there was a large school (of fish) of approximately 200 tons, just
20 what they needed to get the Vessel loaded. MENG-HENG YEN proceeded to tell
21 Poznanski that they were within Howland Island's waters, and then, MENG-HENG YEN
22 insisted that Poznanski change the recorded position of the Vessel to show the Vessel
23 outside of the United States EEZ. While MENG-HENG YEN was discussing this with
24 Poznanski, CHIANG-SHOU YEN smiled and made short remarks to Poznanski. Thus,
25 Poznanski knew that CHIANG-SHOU YEN knew what was occurring in MENG-HENG
26 YEN's discussion with him (Poznanski).

1 iv. In response to MENG-HENG YEN's demand to record a false
2 position for the Vessel, Poznanski retrieved a nautical chart, and pointed to an area on the
3 chart that was outside of the United States EEZ around Howland and Baker Islands. To
4 this, MENG-HENG YEN told Poznanski in Taiwanese that "that was excellent" and gave
5 Poznanski the thumb-up approval gesture. Poznanski let MENG-HENG YEN believe
6 that he (Poznanski) had used the false position data, even though Poznanski did document
7 the correct and true position of the Vessel, which was inside the United States EEZ.

8 v. In addition to MENG-HENG YEN's initial coercive attempt to
9 have Poznanski record a vessel position outside of the United States EEZ, MENG-HENG
10 YEN continued through January 2, 2004 to pressure Poznanski multiple times to record
11 Vessel positions outside of the United States EEZ.

12 vi. On January 8, 2004, MENG-HENG YEN approached Poznanski
13 as Poznanski was reviewing the data in his (Poznanski's) observer workbook, and insisted
14 that he (MENG-HENG YEN) be allowed to look at the workbook. As MENG-HENG
15 YEN reviewed through the workbook, he came upon the pages in the workbook that
16 covered the times when he had requested that Poznanski record Vessel positions showing
17 the Vessel outside of the United States EEZ. MENG-HENG YEN discovered that
18 Poznanski had never changed the position coordinates, and forcefully demanded that
19 Poznanski change the coordinates as soon as possible. When Poznanski explained to
20 MENG-HENG YEN that the Vessel never even set (deployed its net) in those areas,
21 MENG-HENG YEN told Poznanski that there should not be anything that indicates that
22 the Vessel was even near that area.

23
24 **C. The KOO'S 108 Did Not Have A Permit To Fish In The EEZ**

25 19. Based on information I learned from Alvin Katekaru, the NOAA Assistant
26 Regional Administrator for Sustainable Fisheries for the NOAA Pacific Islands Regional
27 Office, I know the following to be true:

1 a. A foreign fishing vessel would have to have a Pacific Insular Area
2 fishery agreement ("PIAFA") permit to legally fish within the United States EEZ at a
3 Pacific insular possession area like Howland and Baker Islands.

4 b. No PIAFA permit has been issued to any foreign fishing vessel to fish in
5 the Pacific insular possessions since the PIAFA mechanism came into existence in 1997.

6 c. If any foreign fishing vessel is fishing in the EEZ around Howland and
7 Baker Islands, the foreign fishing vessel is doing so illegally.

8
9 **D. The Owner Of The KOO'S 108 Was Previously Fined For A Different**
10 **Vessel Deploying FADs In The U.S. EEZ**

11 20. Based on my review of FFA vessel registration applications for the KOO'S
12 108 and NIUGINI 103 received from SA Painter, NIUGINI 103 case settlement
13 documents received from the NOAA Office of General Counsel, NIUGINI 103 case file
14 documents received from the NOAA OLE Southwest Division, and information obtained
15 from Internet web site for the Taiwanese government's Government Information Office, I
16 know the following to be true:

17 a. In August 2000, the NIUGINI 103, a foreign purse seine fishing vessel,
18 illegally deployed five FADs while inside the United States EEZ surrounding Howland
19 and Baker Islands. The Vessel, on paper owned by the NIUGINI FISHING COMPANY,
20 was in reality owned by KWANG-MING KOO of Taiwan, who was listed as the owner
21 on the NIUGINI 103's FFA vessel registration application.

22 b. As a result of the NIUGINI 103 deploying FADs into the United States
23 EEZ around Howland and Baker Islands, the NOAA Office of General Counsel issued a
24 civil Notice of Violation and Assessment ("NOVA") to the Nuigini Fishing Company and
25 to Tsuguo Utsumi, the master of the Vessel. The NOVA demanded the payment of a civil
26 penalty for the illegal fishing activity within the United States EEZ. In the process of
27 negotiating and signing a settlement with NOAA, a shipping agent, who expressed that he
28 represented the Vessel's owner, informed NOAA that the NIUGINI 103 had become the

1 **KOO'S 103**, the owner of the Vessel was Mr. KOO and the KFC, and that the Vessel
2 was currently based in the RMI. Further, the agent, on behalf of Mr. KOO and the KFC,
3 ultimately agreed to pay the United States Government \$50,000.00 (U.S. dollars) to settle
4 the case.

5 c. The **KOO'S 108's** FFA Vessel registration application lists the KOO'S
6 FISHING COMPANY, LTD. as the Vessel's owner, and that the Vessel is a RMI flagged
7 Vessel.

8
9 d. During the interview of Poznanski on August 10, 2005, Poznanski
10 informed me of the following:

11 i. The KFC is owned by Mr. KOO, and Mr. KOO lives in Taiwan.

12 ii. The KFC currently had six Vessels based out of RMI, and they
13 were the **KOO'S 101, 102, 103, 106, 107, and the 108.**¹

14 iii. The KFC is a Taiwanese company.

15 e. On a Taiwanese Government Information Office website, KWANG-
16 MING KOO was listed as a national policy advisor to the Taiwanese President from the
17 year 2000, and also as the chairman for the KFC from 1996. Further, an address provided
18 on the website for KWANG-MING KOO was materially the same address as that
19 provided for KWANG-MING KOO on the FFA Vessel registration application for the
20 NIUGINI 103.

21 **VI. CONCLUSION**

22
23 21. Based on the information contained herein, I believe there is probable cause to
24 support the issuance of an arrest warrant, under 16 U.S.C. §1861, to arrest the **KOO'S**
25 **108**, including the Vessel's fishing gear, furniture, appurtenances, stores, cargo,

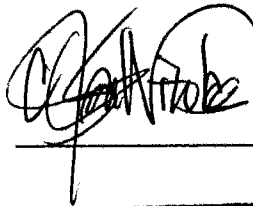
26
27 ¹Information learned during a meeting with KFC officials, RMI Government officials, and a defense
28 attorney on September 24, 2006 reveals, that as of September 24, 2006, the KFC has four purse seine vessels in
operation, and they are 101, 102, 107 and 108.

1 electronic and documentary records, and catch of fish for violating 16 U.S.C. §
2 1857(2)(B) (Foreign Fishing Vessel Engaged in Fishing within the United States EEZ
3 without a Valid and Applicable Permit).

4
5 

6 JEFFREY M. POLLACK
7 Special Agent, NOAA OLE
8

9
10 SUBSCRIBED and SWORN to before me on this 2nd day of October 2006, 2006.

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12 
13

14
15 **CARMELLETA Q. SAN NICOLAS**
16 Notary Public
17 In and for Guam, U.S.A.
18 My Commission Expires: Aug. 15, 2010
19 Sirena Plaza, Ste. 500,
20 108 Hernan Cortez Avenue
21 Hagatna, Guam 96910
22
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